

FILEDUNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

JUL 14 2020

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARK CHRISTOPHER ARNOLD,

Defendant.

MITCHELL R. ELFERS
CLERKCRIMINAL NO. 20-1480 WJCount 1: 18 U.S.C. § 875(c): Interstate
Communication of Threats;Count 2: 18 U.S.C. §§ 2261A(2)(B) and
2262: Cyber-Stalking;Count 3: 18 U.S.C. §§ 1030(a)(2)(C) and
(c)(2)(B)(ii): Unauthorized Computer
Access in Furtherance of Cyber-Stalking;
andCount 4: 18 U.S.C. § 1028A(a)(1):
Aggravated Identity Theft in Furtherance
of Unauthorized Computer Access.INDICTMENT

The Grand Jury charges:

Count 1

On or about May 5, 2019, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **MARK CHRISTOPHER ARNOLD**, knowingly and willfully did transmit in interstate and foreign commerce communications containing a threat to injure H.M.

In violation of 18 U.S.C. § 875(c).

Count 2

Between on or about May 5, 2019 and May 24, 2020, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **MARK CHRISTOPHER ARNOLD**, with the intent to harass and intimidate H.M., used an interactive computer service, electronic communication service, and facility of interstate and foreign commerce to engage in a course of conduct that caused, and would reasonably be expected to cause, substantial emotional distress to H.M.

In violation of 18 U.S.C. §§ 2261A(2)(B) and 2262.

Count 3

On or about May 23, 2020, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **MARK CHRISTOPHER ARNOLD**, intentionally exceeded authorized access to a computer and thereby obtained information from a protected computer, and the offense was committed in furtherance of a criminal act in violation of the laws of the United States, specifically, Cyber-Stalking as charged in Count 2 of this Indictment.

In violation of 18 U.S.C. §§ 1030(a)(2)(C) and (c)(2)(B)(ii).

Count 4

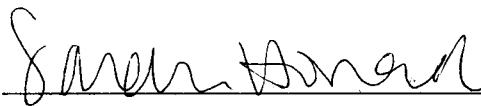
On or about May 23, 2020, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **MARK CHRISTOPHER ARNOLD**, knowingly and unlawfully used and possessed, without lawful authority, a means of identification of H.M., namely that person's name, Facebook login information, and at least one picture of that person, knowing that the means of identification belonged to an actual person other than himself, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), specifically Unauthorized Computer Access as charged in Count 3 of this Indictment.

In violation of 18 U.S.C. § 1028A(a)(1).

A TRUE BILL:



FOREPERSON OF THE GRAND JURY



Assistant United States Attorney

____ July 14, 2020